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12 UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA
14

15 ARROWOOD INDEMNITY COMPANY, a
16 Delaware corporation, formerly known as
17 ROYAL INSURANCE COMPANY OF
18 AMERICA, and successor to ROYAL
19 GLOBE INSURANCE COMPANY,

20 *Plaintiff,*

21 v.

22 CITY OF WEST SACRAMENTO; and
23 ROES 1-50, inclusive,

24 *Defendant.*

25 AND RELATED COUNTER-CLAIM
26

Case No. 2:21-CV-00397-WBS-JDP

DECLARATION OF BRET A. STONE IN
SUPPORT OF CITY OF WEST
SACRAMENTO'S OPPOSITION TO
ARROWOOD'S MOTION FOR SUMMARY
JUDGMENT OR, IN THE ALTERNATIVE,
PARTIAL SUMMARY JUDGMENT

Hon. William B. Shubb

27 I, Bret A. Stone, hereby declare as follows:

28 I am an attorney in good standing, and am licensed to practice law in all of the courts in the
State of California. I am a partner with the law firm of Paladin Law Group® LLP, which represents
The City of West Sacramento in this litigation. As a result of my work on Defendants' behalf, I
have personal knowledge of the matters stated herein and could and would competently testify
thereto if called upon to do so.



1 1. Attached as **EXHIBIT 1** is a true and correct copy of excerpts of the deposition of John
2 Clark taken in the Underlying Action, *City of West Sacramento et al. v. R and L Business*
3 *Management et al.*, U.S. District Court, E.D. Cal., No. 2:18-cv-00900-WBS-EFB on June 7, 2019.

4 2. Attached as **EXHIBIT 2** is a true and correct copy of excerpts of the deposition of John
5 Clark taken in the Underlying Action, on August 7, 2020.

6 3. Attached as **EXHIBIT 3** is a true and correct copy of excerpts of the deposition of John
7 Clark taken in this action, on August 4, 2021.

8 4. Attached as **EXHIBIT 4** is a true and correct copy of excerpts of the deposition of John
9 Clark taken in this action, on September 3, 2021.

10 5. Attached as **EXHIBIT 5** is a true and correct copy of excerpts of the deposition of
11 Richard Leland taken in the Underlying Action, on June 6, 2019.

12 6. Attached as **EXHIBIT 6** is a true and correct copy of excerpts of the deposition of
13 Richard Leland taken in the Underlying Action, on August 7, 2020.

14 7. Attached as **EXHIBIT 7** is a true and correct copy of excerpts of the deposition of
15 Richard Leland taken in the Underlying Action, on August 8, 2020.

16 8. Attached as **EXHIBIT 8** is a true and correct copy of excerpts of the deposition of
17 Robert Bennett taken in this action, on July 28, 2021.

18 9. Attached as **EXHIBIT 9** is a true and correct copy of Anne Farr's expert report dated
19 October 4, 2021.

20 10. Attached as **EXHIBIT 10** is a true and correct copy of Anne Farr's expert rebuttal
21 report dated October 18, 2021.

22 11. Exhibit 11 is purposely left blank.

23 12. Exhibit 12 is purposely left blank.

24 13. Attached as **EXHIBIT 13** is a true and correct copy of excerpts of the deposition of
25 Anne Farr taken in this action, on November 5, 2021.

26 14. Attached as **EXHIBIT 14** is a true and correct copy of the Evidentiary Hearing
27 Transcript from Day 1 taken in the Underlying Action dated August 25, 2020.

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